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**Via ECF**

March 12, 2020

Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Virgil Griffith  
20 Cr. 15 (PKC)**

Dear Judge Castel:

Counsel for defendant Virgil Griffith write to respectfully request a continuance of the March 17, 2020 status conference date. The defense has conferred with Your Honors chambers and understands that the Court is available at 11:30 a.m. on April 23, 2020. The government consents to this request.

Mr. Griffith first appeared before the Court on January 30, 2020 for his arraignment, at which time the Court set a status conference date of March 17, 2020. Since that time, the government has been producing a substantial volume of discovery to the defense on an ongoing basis. Last week, the defense learned that the government had recently received additional electronic discovery of approximately 65 GB and that the government planned to produce it to the defense this week. The defense anticipates it will take three to four weeks to review this new discovery and factor it into its pre-trial motion practice. To have adequate time to review and analyze the latest sizeable batch of discovery before the status conference, the defense needs a brief continuance.

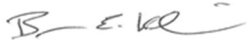
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For all the above reasons, the defense respectfully requests a new status conference date of April 23, 2020 at 11:30 a.m. The defense further consents to the exclusion of time under the Speedy Trial Act until that date.

Respectfully submitted,



Brian E. Klein  
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-and-

Sean S. Buckley  
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*Attorneys for Virgil Griffith*

cc: AUSAs Kyle Wirshba, Kimberly Ravener, and Michael Krouse